



Western States Petroleum Association
Credible Solutions • Responsive Service • Since 1907

Kevin Buchan

Manager, Bay Area Region

Victor Douglas
Principal Air Quality Specialist
Technical Services Division
Bay Area Air Quality Management District
375 Beale Street
San Francisco, CA 94105

via email at: vdouglas@baaqmd.gov

RE: Request for Comment Extension Period, Regulation 11-18 Supplemental Documents

Dear Mr. Douglas,

The Western States Petroleum Association (WSPA) is a non-profit trade association representing twenty-six companies that explore for, produce, refine, transport and market petroleum, petroleum products, natural gas and other energy supplies in California, Arizona, Nevada, Oregon, and Washington. Our members in the Bay Area have operations and facilities regulated by the Bay Area Air Quality Management District (District).

WSPA and the Bay Area refineries received public notice on October 4th for comment on multiple documents pertaining to the proposed Regulation 11-18. These documents include the draft Staff Report and TBARCT workbook.

The notice indicated a deadline for public input by October 16th, providing only 12 calendar days for comment. The detailed information provided in just the Staff Report and TBARCT workbook alone would require more time to adequately review and submit comments.

WSPA requests the BAAQMD provide a comment period extension to November 3rd.

Please reply with your decision on our request via my email below. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Kevin Buchan". The signature is written in a cursive, flowing style.